



1300 I Street, NW
Suite 400 West
Washington, DC 20005

Donald C. Brittingham
Director – Wireless/Spectrum Policy
202 589-3785

January 22, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: *Ex Parte* Presentation
IB Docket No. 01-185; ET Docket No. 95-18; ET Docket No. 00-258

Dear Ms. Dortch:

Today, the attached letter was sent to Chairman Powell. Pursuant to Section 1.1206(b)(1) of the Commission's Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald Brittingham".

Donald Brittingham

cc: Bryan Tramont
 John Branscome
 Sam Feder
 Paul Margie
 Barry Ohlson
 Jennifer Warren
 Tom Sugrue
 Ed Thomas
 Rick Engelman
 Bruce Franca
 Kathleen Ham
 Marty Liebman
 Cathy Seidel
 Tom Stanley

Richard J. Lynch
Executive Vice President & CTO



Verizon Wireless
180 Washington Valley Road
Bedminster, New Jersey 07921
Phone 908 306-5000

January 22, 2003

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

Re: IB Docket No. 01-185; ET Docket No. 95-18

Dear Mr. Chairman:

I am writing regarding an important policy matter that is currently being addressed by the Commission. The outcome will affect the operations of wireless operators like Verizon Wireless.

The Commission is considering whether to allow Mobile Satellite Service ("MSS") licensees the ability to provide terrestrial services like those provided by Verizon Wireless. My company has already filed its objection to such an action on the grounds that it would be inconsistent with the law and sound spectrum management policy. However, the potential harm created by such an action goes beyond a policy debate. Without adequate technical limitations, the operations of MSS mobile transmitters in bands that are close to the PCS band will cause harmful interference to PCS operations.

Verizon Wireless and other wireless operators deal with interference issues on a regular basis. In fact, due to the very small separations between the PCS mobile transmit band (1850-1910 MHz) and the PCS mobile receive band (1930-1990 MHz), there is a potential for PCS mobile transmitters to interfere into PCS mobile receivers. As a result, the wireless industry has developed technical specifications to reduce the potential for harmful interference. PCS phones used by Verizon Wireless customers are built in accordance with the industry standard TIA/EIA-IS95-B. This standard specifies that spurious emissions located anywhere in the mobile receive band between 1930 and 1990 MHz must be less than -80 dBm, measured in a 1.23 MHz resolution bandwidth. This same standard should apply to MSS operators that provide terrestrial wireless services.

In addition to the potential for out-of-band emissions from MSS phones to cause harmful interference, PCS phones will not be able to sufficiently reject in-band MSS signals without adequate frequency separation. This need for separation between transmit and receive frequencies is reflected in the current 20 MHz gap between the PCS transmit and receiver bands. The Commission should ensure that it provides adequate frequency separations between PCS and MSS terrestrial operations.

In the event that the Commission authorizes MSS licenses to provide terrestrial service, I urge you to ensure that such operations do not cause harmful interference to existing PCS services. This harmful interference can be avoided by imposing a -80 dBm emission limit on MSS terrestrial operations and by ensuring that such operations are not permitted below 2010 MHz. This will ensure that MSS operations comply with the same interference standards followed by the wireless industry and will avoid harmful interference to PCS customers.

Sincerely,

A handwritten signature in black ink, reading "Richard J. Lynch". The signature is fluid and cursive, with the first name "Richard" and last name "Lynch" clearly legible.

cc: Commissioner Kathleen Abernathy
Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Kevin Martin